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Attorneys for Interested Party
First State Insurance Company

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re
THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO.
Debtor.

Case No. 23-30564 (DM)

Chapter 11

Hon. Dennis Montali

**FIRST STATE INSURANCE
COMPANY'S JOINDER IN EX
PARTE APPLICATION OF CERTAIN
INSURERS FOR ENTRY OF AN
ORDER PURSUANT TO
BANKRUPTCY RULE 2004
COMPELLING PRODUCTION OF
DOCUMENTS**

First State Insurance Company ("First State") by and through their undersigned
attorneys, hereby join in the *Ex Parte* Application of Certain Insurers for Entry of an Order
Pursuant to Bankruptcy Rule 2004 Compelling Production of Documents [Dkt. No. 571] (the
joinder ex parte prod doc.not.docx

First State's Joinder In Ex Parte Application

1 “Application”) filed by Century Indemnity Company, as successor to CCI Insurance
2 Company, as successor to Insurance Company of North America, Pacific Indemnity Company,
3 Westchester Fire Insurance Company as successor in interest to Industrial Underwriters
4 Insurance Company for policies JU835-8355 and JU895-0964, and Continental Insurance
5 Company.

6 For the reasons stated in the Application, First State respectfully requests that this
7 Court grant the Application and grant such other and further relief as the Court may deem just
8 and proper.

9 DATED: April 5, 2024

Michael W. Ellison
SMITH ♦ ELLISON
A Professional Corporation

12 By /S/ MICHAELW. ELLISON
Michael W. Ellison
Attorneys for Interested Party First State
Insurance Company

14 and

15 Joshua D. Weinberg (*pro hac vice*)
16 Annette P. Rolain (*pro hac vice*)
17 RUGGERI PARKS WEINBERG LLP

1 **CERTIFICATE OF SERVICE**

2
3 1. I am employed with the law firm of Smith ♦ Ellison, whose address is 2151
4 Michelson Drive, Suite 185, Irvine, California 92612; I am not a party to the cause; I am over
the age of eighteen years.

5 2. I hereby certify that on this 1st day of November 2023, I electronically filed
the following document with the Clerk of the Court by using the CM/ECF system:

6 **FIRST STATE INSURANCE COMPANY'S JOINDER IN EX**
7 **PARTE APPLICATION OF CERTAIN INSURERS FOR ENTRY OF**
8 **AN ORDER PURSUANT TO BANKRUPTCY RULE 2004**
COMPELLING PRODUCTION OF DOCUMENTS

9 3. Participants in the case who are registered CM/ECF users will be served by
10 the CM/ECF system. On this 1st day of November 2023, I caused for collection and
processing of correspondence for mailing with the United States Postal Service and know that
11 in the ordinary course of Smith ♦ Ellison's business practice the document described above
will be deposited with the United States Postal Service on the same date that it is placed at
12 Smith ♦ Ellison with postage thereon fully prepaid for collection and mailing on any of the
following non-CM/ECF participants:

13 I declare under penalty of perjury under the laws of the United States of America
that the above is true and correct.

14 Executed this 5th day of April 2024, at Irvine, California.

15 /S/ KATHLEEN HIGUERA
16 Kathleen Higuera